

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE COMMISSION,)
Plaintiff,)
v.) Case No. 21-CV-11938 (DPW)
VINCENZO CARNOVALE,)
Defendant.)

JOINT MOTION FOR TO EXTEND TIME TO RESPOND
TO COMPLAINT TO AUGUST 8, 2022

Plaintiff Securities and Exchange Commission and defendant Vincenzo Carnovale jointly submit this motion to extend the date by which the defendant must respond to the complaint in this matter by 45 days to August 8, 2022. August 8, 2022, is the first business day occurring 45 days after the current deadline, June 23, 2022. As grounds for this request, the parties state that they have been engaging discussions to determine whether resolution of the matter is appropriate. The parties are further considering potential early disclosure of certain discovery materials to facilitate those settlement discussions. The parties believe that the extension of time is in their interest as well as that of the Court, as the settlement discussions may obviate the need for further litigation in this matter, conserving the resources of the parties and the Court.

Accordingly, the parties respectfully request that the Court allow this motion, and grant the defendant until August 8, 2022 to respond to the complaint in this matter.

Dated: June 16, 2022

Respectfully submitted,

SECURITIES AND EXCHANGE
COMMISSION

By its Attorney,

/s/ David J. D'Addio
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Vincenzo Carnovale

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Certificate of Service

I, David J. D'Addio, certify that on June 16, 2022, I filed the foregoing motion electronically with the Court. The filing will be sent to the registered participants as identified on the Notice of Electronic Filing and may also be accessed through the Court's ECF system.

/s/ David J. D'Addio
David J. D'Addio